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*Attorneys for Defendants
Timothy Calumpong, Betty S. Omandac,
Ella Cordovez, and Gabriela Najera,*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SANDRA HERRERA,

Plaintiff,

v.

FLORENCE MCLURE WOMEN'S
CORRECTIONAL CENTER FACILITY,
DEPARTMENT OF CORRECTION, a
Political Subdivision of The State of Nevada,
et.al.,

Defendants.

Case No: 2:23-cv-01397-JAD-BNW

**STIPULATION AND ORDER TO
EXTEND DEFENDANTS' REPLY IN
SUPPORT OF THEIR MOTION FOR
SUMMARY JUDGMENT
[ECF NO. 28]**

(FIRST REQUEST)

ECF No. 39

Defendants, Timothy Calumpong, Betty S. Omandac, Ella Cordovez, and Gabriela Najera, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Mayra Garay, Deputy Attorney General, of the State of Nevada, Office of the Attorney General and Plaintiff by and through attorney of record, James D. Urrutia, Esq. of LJU LAW FIRM, hereby submit their stipulation and agreement to extend the deadline for Defendants' to file their Reply in Support of their Motion for Summary Judgment [ECF 28] and respectfully request that the Court **extend the response deadline for a period of 20 days, making Defendants' new deadline June 11, 2025.** The parties' request is supported in good cause.

Defense counsel is diligently working and conducting thorough research to respond to Plaintiff's opposition to Defendants' Motion for Summary Judgment. However, due to

1 the passing of a close family member of Defense Counsel and the recent departure of
2 Defense Counsel's paralegal, the parties have agreed to extend the response deadline to
3 June 11, 2025.

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5 Dated this 22nd day of May, 2025.

6 **LJU LAW FIRM**

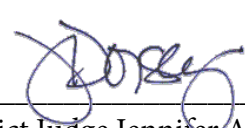
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8 /s/James D. Urrutia
9 JAMES D. URRUTIA, ESQ.
10 Nevada Bar No. 12885
11 7575 Vegas Drive, Suite 100
12 Las Vegas, Nevada 89128
13 *Counsel for Plaintiff*

Dated this 22nd day of May, 2025.

6 **OFFICE OF THE ATTORNEY
GENERAL**

7
8 /s/ Mayra Garay
9 MAYRA GARAY, ESQ.
10 (Bar No. 15550)
11 Deputy Attorney General
12 1 State of Nevada Way, Suite 100
13 Las Vegas, NV 89119
14 *Counsel for Defendants*

13 **IT IS SO ORDERED.**

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20 U.S. District Judge Jennifer A. Dorsey
21 May 23, 2025
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